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October 4, 2022

Via ECF

Hon. Paul G. Gardephe, U.S.D.J.
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Johnson-Cradle v. KPS Affiliates Inc. et al
Case No.: 22-cv-01052-PGG-SLC

Your Honor,

This office represents the Named Plaintiff, as well as the putative class and collective in the above referenced action brought under the Fair Labor Standards Act ("FLSA") and New York Labor Law ("NYLL"). We write, with Defendants' consent, to request an adjournment of the in-person pre-motion conference concerning Defendants' anticipated motion to dismiss currently scheduled for October 6, 2022 at 10:45AM. The parties have conferred and are available on October 11; 13 (after 10AM) and 14 for this conference. We are requesting this relief because undersigned trial counsel will be defending a deposition on a complex employment discrimination action. The state court deposition has been adjourned several times and cannot be adjourned again without violating a NYS Court Order.

We thank the Court for its courtesy in this regard.

MEMO ENDORSED

*The conference is adjourned to
October 13, 2022 at 10:15 a.m.*

SO ORDERED:

Paul G. Gardephe

Paul G. Gardephe, U.S.D.J.

Oct. 4, 2022

Respectfully Submitted,
LAW OFFICE OF WILLIAM CAFARO

By: Amit Kumar, Esq.
Attorneys for Plaintiffs

CC:
All Attorneys of Record (via ECF)